

# **EXHIBIT 2**

**From:** Kendall Montgomery  
**To:** [Anand, Nehal S.](#); [Prihoda, Nathan](#)  
**Cc:** [Fred Hagans](#)  
**Subject:** Mena v. AON  
**Date:** Thursday, November 14, 2019 11:38:13 AM

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[EXTERNAL E-MAIL]

Nehal and Nathan:

After review of the proposed Agreed Order Pursuant to Rule of Evidence 502(d), we are not in agreement to an Order addressing the issue. We believe Rule of Evidence 502 specifically addresses and handles the situation of any inadvertent disclosure of protected information and what does or does not constitute a waiver of a privilege. As discussed in our call this morning, we have never had a situation arise where the rules governing inadvertent disclosure were not found to be effective in dealing with the situation.

Regards,

Kendall

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